

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

JOINT REPORT ON ALTERNATIVE DISPUTE RESOLUTION

TO THE HONORABLE COURT:

Plaintiff/Counter-Defendant David E. Seitz (“Seitz”) and Defendant/Counter-Plaintiff A.O. Smith Corporation (“A.O. Smith”) file this Joint Report on Alternative Dispute Resolution pursuant to Local Rule CV-88 and the Court’s Scheduling Order, and would respectfully show the following:

1. The parties believe that alternative dispute resolution is appropriate in this case. The person responsible for settlement negotiations on behalf of the Plaintiff is David E. Seitz, along with counsel. The people responsible for settlement negotiations on behalf of A.O. Smith are Brian Cothroll and Rebecca Kennedy, along with counsel.

2. The parties have engaged in preliminary discussions regarding a mediation, but have not yet agreed on a mediator or a date for a mediation.

3. In addition, the parties will exchange written settlement offers and responses, as required by the Court's Scheduling Order.

DATED: April 3, 2020.

Respectfully submitted,

DAVIS & SANTOS, P.C.

By: /s/ Jay Hulings

Jason M. Davis
State Bar No. 00793592
Email: jdavis@dslawpc.com
Jay Hulings
State Bar No. 24104573
Email: jhulings@dslawpc.com
719 S. Flores Street
San Antonio, Texas 78204
Tel: (210) 853-5882
Fax: (210) 200-8395

LAW OFFICES OF STEVE A. BRYANT, P.C.

Steve A. Bryant
State Bar No. 03277900
Email: sab@sabryant.com
3243 Canterbury Ln.
Montgomery, TX 77356-8943
Tel: (936) 448-7672
Fax: (800) 732-0588

ATTORNEYS FOR PLAINTIFF DAVID E. SEITZ

LIGHTFOOT, FRANKLIN & WHITE, LLC

By: /s/ Brian C. Boyle

Brian C. Boyle
State Bar No. 24045543
Email: bboyle@lightfootlaw.com
Charles M. Stam
State Bar No. 24106462
Email: cstam@lightfootlaw.com
1885 St. James Place, Ste. 1150
Houston, Texas 77056
Tel: (713) 960-1488
Fax: (713) 960-8991

ATTORNEYS FOR DEFENDANT A.O. SMITH CORPORATION

CERTIFICATE OF SERVICE

I certify that on the 3rd day of April 2020, the foregoing document was electronically filed with the Clerk of the Court using the CM/ECF system and all counsel of record will receive an electronic copy via the Court's CM/ECF system.

Brian C. Boyle _____ Overnight Mail
Charles M. Stam _____ Certified Mail-RRR
LIGHTFOOT, FRANKLIN & WHITE, LLC _____ Facsimile
1185 St. James Place, Ste. 1150 _____ X E-mail
Houston, Texas 77056
Email: bboyle@lightfootlaw.com
Email: cstam@lightfootlaw.com
Attorneys for Defendant

/s/ Jay Hulings

Jay Hulings